
APPEAL NO: 03-21-00053-CV

In the Court of Appeals for Third District of Texas FILED IN
3rd COURT OF APPEALS
AUSTIN, TEXAS

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JEFFREY D. KYLE
Clerk

Mary Louise Serafine,
PLAINTIFF-APPELLANT,

v.

*Karin Crump, in her individual and official capacities as Presiding Judge of the
250th Civil District Court of Travis County, Texas; and Melissa Goodwin, in
her individual and official capacities as Justice of the Third Court of Appeals
at Austin, Texas; David Puryear and Bob Pemberton, in their individual
capacities as former justices of the Third Court of Appeals at Austin, Texas,*
DEFENDANTS-APPELLEES.

**ON APPEAL FROM THE 345TH JUDICIAL DISTRICT COURT OF TRAVIS
COUNTY, TEXAS**

**APPELLEE JUDGE KARIN CRUMP'S UNOPPOSED SECOND MOTION
FOR EXTENSION OF TIME TO FILE APPELLEE'S BRIEF**

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TO THE HONORABLE THIRD COURT OF APPEALS:

Appellee Judge Karin Crump files this unopposed request for her second extension of the deadline to file her Appellee's Brief, which is currently due on Friday, August 20, 2021. On June 21, 2021 Appellant filed her sixty-four (64) page brief, accompanied by an appendix totaling another one hundred and eighteen (118) pages of record excerpts. On July 14, 2021, Appellee Judge Crump sought a thirty (30) day first extension of time to allow for sufficient time to adequately brief the myriad of issues addressed in Appellant's brief in light of the demands of the undersigned counsel's existing docket and the vacation schedule of counsel. On July 15, 2021, Appellee Judge Crump's motion was granted making her brief due on August 20, 2021. On July 22, 2021 the Court granted Appellant's motion to supplement appellant's brief, making same due on August 2, 2021. Appellant's Supplemental Brief and Appendix was filed on August 2, 2021.

Appellee Judge Crump now seeks a three (3) business days extension of time due to co-counsel's work on an internal investigation not related to this case and a prior out of town family commitment the weekend of August 21- 22, 2021. In light of these factors, coupled with the length of Appellant's

Brief and the Record in this matter, and other docket commitments, an extension of time is necessary to adequately brief the issues on appeal in this case. If granted, the three business days extension would make Appellee Judge Crump's deadline to file her Appellee's Brief Wednesday, August 25, 2021.

On August 19, 2021, the undersigned counsel conferred with Appellant regarding the filing of this motion. Appellant is UNOPPOSED to Appellee Judge Crump's First Motion for Extension of Time. Additionally, the undersigned counsel also conferred with counsel for the State Justice Appellees, who is also UNOPPOSED. Appellee Judge Crump's Second Motion for Extension of Time is not sought solely for purposes of delay or any other improper purpose. This Court should allow a three-day extension of time for movant to prepare her Appellee's Brief.

CONCLUSION

Appellee Crump respectfully requests that this Court grant her second motion for a three (3) business days extension of time to file her Appellee's Brief, extending her deadline to August 25, 2021.

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By: /s/ Anthony J. Nelson
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NOTICE OF ELECTRONIC FILING

I, **ANTHONY J. NELSON**, Assistant County Attorney, do hereby certify that I have electronically submitted for filing, a true and correct copy of the foregoing in accordance with the eFile Texas system of the 3rd Court of Appeals on August 19, 2021.

/s/ Anthony J. Nelson
ANTHONY J. NELSON
Assistant County Attorney

CERTIFICATE OF SERVICE

I, **ANTHONY J. NELSON**, Assistant County Attorney, do hereby certify that a true and correct copy of the above and foregoing has been served via email, through eFile Texas, on August 19, 2021, to all counsel of record.

/s/ Anthony J. Nelson
ANTHONY J. NELSON
Assistant County Attorney

RULE 9.4(I) CERTIFICATE OF COMPLIANCE

I certify that this computer-generated document, accounting for Rule 9.4(i)(1)'s inclusions and exclusions, is 339 words, as calculated by Microsoft Word 2016, the computer program used to prepare this document.

/s/ Anthony J. Nelson
ANTHONY J. NELSON
Assistant County Attorney

CERTIFICATE OF CONFERENCE

On August 19, 2021, on behalf of Appellee, Judge Karin Crump, counsel for Judge Crump conferred with Plaintiff-Appellant, a licensed attorney, regarding the filing of Appellee Judge Karin Crump's First Motion for Extension of Time to File Appellee's Brief. Plaintiff-Appellant indicated she is UNOPPOSED to the filing of same. Also on August 19, 2021, on behalf of Appellee, Judge Karin Crump, counsel for Judge Crump conferred with Assistant Attorney General, Courtney Corbello, counsel of record for Defendants-Appellees, Justices Hon. Melissa Goodwin, Hon. David Puryear and Hon. Bob Pemberton, regarding the filing of Appellee Judge Karin Crump's First Motion for Extension of Time to File Appellee's Brief. Counselor Corbello likewise indicated she is UNOPPOSED to the filing of same.

/s/ Anthony J. Nelson

ANTHONY J. NELSON

Assistant County Attorney

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